

DMB:SA/SDD/RMT
F.#2012R01574

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

- - - - - X

UNITED STATES OF AMERICA

- against -

ALI YASIN AHMED,
also known as "Ismail,"
MADHI HASHI,
also known as "Talha," and
MOHAMED YUSUF,
also known as "Abu Zaid,"
"Hudeyfa" and
"Mohammed Abdulkadir,"

Defendants.

CR 12-661

Cr. No. _____
(T. 18, U.S.C., §§
924(c)(1)(A)(ii),
924(c)(1)(A)(iii),
924(c)(1)(B)(ii),
2339B(a)(1), 2339B(d),
2 and 3551 et seq.)

TOWNES, J.

- - - - - X

THE GRAND JURY CHARGES:

AZRACK, M.J.

COUNT ONE

(Conspiracy to Provide Material Support
to a Foreign Terrorist Organization)

In or about and between December 2008 and August 2012,
both dates being approximate and inclusive, within the
extraterritorial jurisdiction of the United States, the
defendants ALI YASIN AHMED, also known as "Ismail," MADHI HASHI,
also known as "Talha," and MOHAMED YUSUF, also known as "Abu
Zaid," "Hudeyfa" and "Mohammed Abdulkadir," together with others,
did knowingly and intentionally conspire to provide material
support and resources, as defined in Title 18, United States
Code, Section 2339A(b), including currency, weapons and

personnel, including themselves, to a foreign terrorist organization, to wit: al-Shabaab.

(Title 18, United States Code, Sections 2339B(a)(1), 2339B(d) and 3551 et seq.)

COUNT TWO
(Use of Firearms)


In or about and between December 2008 and August 2012, both dates being approximate and inclusive, within the extraterritorial jurisdiction of the United States, the defendants ALI YASIN AHMED, also known as "Ismail," MADHI HASHI, also known as "Talha," and MOHAMED YUSUF, also known as "Abu Zaid," "Hudeyfa" and "Mohammed Abdulkadir," together with others, did knowingly and intentionally use and carry one or more firearms during and in relation to a crime of violence, to wit: the crime charged in Count One, and did knowingly and intentionally possess such firearms in furtherance of said crime

of violence, one or more of which firearms was brandished and discharged, and one or more of which firearms was a machinegun.

(Title 18, United States Code, Sections
924(c)(1)(A)(ii), 924(c)(1)(A)(iii), 924(c)(1)(B)(ii), 2 and 3551
et seq.)

A TRUE BILL


FOREPERSON


LORETTA E. LYNCH
UNITED STATES ATTORNEY
EASTERN DISTRICT OF NEW YORK

No.

UNITED STATES DISTRICT COURTEASTERN *District of* NEW YORKCRIMINAL *Division***THE UNITED STATES OF AMERICA**

vs.

ALI YASIN AHMED, aka "Ismail," MADHI HASHI, aka "Talha,"
and MOHAMED YUSUF, aka "Abu Zaid"
"Hudeyfa" and "Mohammed Abdulkadir,"

Defendants.

INDICTMENT

(T. 18, U.S.C., §§ 924 (c) (1) (A) (ii) , 924 (c) (1) (A)
(iii) , 924 (c) (1) (B) (ii) , 2339B (a)
(1) , 2339B (d) , 2 and 3551 et seq.)

*A true bill.**Foreman*Milton Wilson

Filed in open court this _____ day,

of _____ A.D. 2009

Clerk

Bail, \$ _____

SETH DUCHARME, AUSA; (718) 254-6021